

Rumrill, Nancy

From: David W Wawrzyniec [FOIA Exemption 6]
Sent: Wednesday, September 17, 2014 11:22 AM
To: Albright, David
Subject: Re: Quick Followup Question - Florence Copper

Hi David

I have tried several times to reach you by phone and sent a couple of e-mails but have not heard back from you. I just wanted to followup to find out whether the 90 day timeframe (on or before October 16th, 2014) was still a reasonable expectation for the issuance of the decision on the draft UIC.

I am again hearing anecdotal reports that tremendous pressure is being applied to the EPA to delay issuing the permit decision.

As you have not responded to my earlier e-mails, I am left wondering whether there is any credence to these rumors. Given the numerous expectations that have been set in the past and ensuing delays, you can understand my concern.

Please advise.

Kind regards,
David Wawrzyniec

On Fri, Jul 18, 2014, at 10:59 AM, Albright, David wrote:

> Hi David,
>
> In response, the current application before us solely pertains to the
> PTF. While there may be elements of our current review that would be
> useful to or otherwise inform a potential future project review, any
> permit request beyond the PTF would require its own independent review
> of the specific project proposal submitted to assure compliance with
> all relevant statutes and regulations.
>
> I hope that helps.
> Regards,
> David
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> -----Original Message-----
> From: David W Wawrzyniec [FOIA Exemption 6]
> Sent: Friday, July 18, 2014 1:57 AM
> To: Albright, David
> Subject: Quick Followup Question - Florence Copper
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> Hi David,
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> I would like to thank you for taking the time to speak with me about
> the Florence Cooper Project.
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> I did have one additional regarding the process that would be followed
> for a commercial permit. It is my understanding that prior to amending
> the current permit for the pilot test facility that substantial work

> had been done on the overall permit including phase 2 and that the EPA
> identified quite a number of deficiencies.
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> In my discussions with the company, phase 1 is intended to provide
> data to address deficiencies in the original permit and to refine the
> commercial permit.
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> Assuming that the company arrives at a point where they want to
> proceed with the commercial permit and it is essentially a refinement
> on their previously submitted permit (i.e., primarily responding to
> previously identified deficiencies) would the review process pick up
> where it left off or would the commercial permit be treated as a start
> from scratch review.
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Rumrill, Nancy

From: David W Wawrzyniec [FOIA Exemption 6]
Sent: Tuesday, August 05, 2014 12:26 PM
To: Albright, David
Subject: Re: Quick Followup Question - Florence Copper

Hi David,

My apologies, I believe my question was a little muddled. Let me state what my understanding was from my earlier research:

1. At first, Curis Resources had submitted an amendment for the BHP permit.
2. In 2011, they asked the EPA to suspend the review of the commercial permit, in order to expedite the PTF permit.
3. When the data from the PTF is sufficient, they would then respond to the previously identified deficiencies in the permit for the commercial phase and ask the EPA to proceed with the review of the existing amendment that was previously suspended.

Is that correct or is the following the reality?

1. Curis will need to submit a new application for a new permit for the commercial operations. (In essence, meaning that the commercial permit review was not merely suspended but actually dead.)
2. The commercial permit would then have to be reviewed in its entirety as a new application even if it is substantially the same permit that was under review with the only changes being in response to the previously identified deficiencies.

Without discussion of specific time requirements for the permit review, my conclusion would be is that if the 2nd scenario is more accurate, the the review process will necessarily be longer than the first scenario.

Kind regards,
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Rumrill, Nancy

From: David W Wawrzyniec [FOIA Exemption 6]
Sent: Wednesday, September 10, 2014 10:36 AM
To: Albright, David
Subject: Followup re Florence Copper/Curis Resources UIC

Hi David,

I just wanted to followup with you regarding the subject UIC permit. When we spoke on July 16th, you indicated that a reasonable expectation for the UIC decision announcement was 90 days.

Is that still a reasonable expectation (i.e., announcement on or before October 16th), or are there further delays?

Kind regards,
David

On Tue, Jul 15, 2014, at 11:22 AM, Albright, David wrote:

> Sounds good. Please give me a call at 7:30am tomorrow. I look
> forward to speaking with you.

>

> Take care,
> David

>

> -----Original Message-----

> From: David W Wawrzyniec [FOIA Exemption 6]

> Sent: Tuesday, July 15, 2014 8:19 AM

> To: Albright, David

> Subject: Re: Follow-up to my letter of May 26, 2013 (Copy attached)

>

> Dear Mr. Albright,

>

> Thank you for your reply. Tomorrow, (Wednesday) before 10 a.m. would
> work best for me. I can ring you at 7:30 or 8:00 a.m. PST. I am 10
> hours later than you so I am quite flexible; let me know what works best for you.

>

> Kind regards,
> David

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> On Tue, Jul 15, 2014, at 10:42 AM, Albright, David wrote:

> > Dear Mr. Wawrzyniec,

> >

> > My apologies for not responding sooner to your letter. I would be
> > happy to talk with you by phone if that is a good option. I am
> > generally in the office between about 7am and 4pm. It would
> > probably be best to set up a specific time to talk. I have some
> > time today at 10:30am or 3pm, or tomorrow before 10am or at 3pm.
> > Let me know if one of those slots works for you.

> >

> > Regards,
> > David

> >

> > *****

> > **

> > *****

> > David Albright, Manager

> > Ground Water Office

> >

> > USEPA, Region IX Phone: 415.972.3971

> > 75 Hawthorne Street Fax: 415.947.3549

> > Mail Code: WTR-9 Email: albright.david@epa.gov

> > San Francisco, CA 94105

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> > -----Original Message-----

> > From: David W Wawrzyniec FOIA Exemption 6

> > Sent: Sunday, July 13, 2014 2:57 AM

> > To: Diamond, Jane; Albright, David

> > Subject: Fwd: Follow-up to my letter of May 26, 2013 (Copy attached)

> >

> > Dear Ms. Diamond and Mr. Albright,

> >

> > As of today, I have not received an acknowledgement or response to

> > my letter dated May 26, 2013 regarding the UIC permitting process on

> > the Florence Copper Project for Curis Resources in Florence, Arizona.

> >

> > In addition to the issues I outlined in my letter, I have lately

> > become even more concerned that in spite of the fact that your

> > offices assured me that the EPA UIC permitting process for this

> > project is a process completely independent of the ADEQ permit and

> > appeals process, which I question based on the fact that no decision

> > has yet been issued and the decision on the ADEQ appeal is not expected until September or October.

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> > I am extremely disturbed by the fact that I have not received any

> > kind of response or acknowledgment of my letter or the very serious

> > concerns I have raised.

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> > I am still overseas but may be traveling due to a family matter that

> > has arisen in the US. I would like to give you a call within the

> > next week or so to discuss my concerns. Please advise as to whether

> > there is a particular time and date that I could call you.

> >

> > For your ease of reference, I have attached a copy of my letter that

> > was sent by e-mail and in hard copy by international courier.

> >

> > Kind regards

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> > David W Wawrzyniec

Rumrill, Nancy

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